

**CHARGE OF DISCRIMINATION  
DARRELL CARTER  
PAGE 1**

**I. Overview of Individual and Class Allegations**

AK Steel Corporation has discriminated and continues to discriminate against me in the terms and conditions of my application for employment with them on the basis of my race, African-American, by denying me the opportunity to be hired while hiring equally or less qualified white employees and subjecting me to a racially hostile application process and other forms of discrimination. I believe that AK Steel Corporation's actions are part of a continuing pattern and practice of discrimination against African-American applicants for employment and employees, including but not limited to, denying applicants hiring opportunities while providing such opportunities to equally or less qualified white applicants and subjecting them to a racially hostile application process.

**II. Statement of Facts**

I applied to AK Steel in April 2002 for a General Laborer position at their factory in Ashland, KY. Susan Lester, a woman in charge of recruitment, took my name, scheduled a time for me to take the AK Steel entrance exam, and had me fill out a job application which inquired into standard subjects like my education and work experience. Because of my background of eight years as an Iron Pouter in the Melting Department of Ironton Iron Intermit, I believed myself to be well qualified to do general labor for AK Steel, and anticipated that I would have no trouble passing any test of the skills necessary for this vocation. In addition, I am currently a Human Services Technology student at Ohio University preparing for a career in Case Management at a group home or juvenile delinquent center, so I am accustomed to taking tests. The AK Steel exam asked mechanical and common sense questions which I found to be relatively easy. Two to three weeks later I called Ms. Lester and was informed that I had not passed the test. She refused to discuss my performance with me and cut off all of my questions.

**III. Statement of Discrimination**

I believe that AK Steel Corporation has discriminated against me and continues to discriminate against me in the terms and conditions of my applications for employment with them on the basis of my race, African-American, in violation of the Civil Rights Act of 1964, as amended, because white applicants with fewer qualifications than me have been hired and I have not, and because I have been subjected to a racially hostile application process and other forms of discrimination and denied the right to apply for work in an environment free of racial discrimination.

I have been adversely affected by these discriminatory practices by being deprived of the equal opportunity to be hired. Such discrimination denies me and other African-Americans the right to be hired for positions for which we are qualified.

This systemic discrimination also adversely affects the status of African-Americans as employees by promoting and reinforcing racial stereotypes and bias in hiring.

**CHARGE OF DISCRIMINATION  
DARRELL CARTER  
PAGE 2**

**IV. Statement of Classwide Discrimination on the Basis of Race**

Based on my experiences, I believe that AK Steel Corporation has engaged and continues to engage in a pattern and practice of discrimination against its African-American applicants for employment and employees that denies them equal employment opportunities in ways including but not limited to the following: denying them hiring opportunities while providing such opportunities to equally or less qualified white employees and subjecting them to a racially hostile application process and work environment in which few other African-Americans are employed. This policy violates Title VII of the 1964 Civil Rights Act, 42 U.S.C. Section 2000(e), et seq.

I believe this policy has effected a class of black persons comprised of all past, present and future black applicants for employment with AK Steel. I believe that these discriminatory practices occur throughout AK Steel Corporation. I make this charge on behalf of myself and all similarly situated African-American applicants for employment and employees.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 6-8-02

Blaneel H. Carter

Charging Party (signature)